

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
) CR NO.05-1849 JH
GEORGE OSGOOD,)
)
Defendant.)

UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO DEFENDANT OSGOOD'S MOTION TO
COMPEL DISCOVERY RELATED TO PEN REGISTER,
CELL PHONE SITE, OR GPS DATA

The United States hereby moves for an extension of time to May 1, 2009 to file its response to the defendant Osgood's Motion to Compel Discovery Related to Pen Register, Cell Phone site, or GPS Data (Doc. 1578) and in support of its motion states as follows:

1. The government's response to the defendant's motion is currently due on April 20, 2009.
2. The parties have negotiated a plea agreement and it is anticipated that a Change of Plea Hearing will take place before Magistrate Judge Lorenzo F. Garcia on April 23, 2009.
3. Once the plea of guilty is entered Defendant Osgood's Motion will be moot.
4. The defendant, through counsel Amy Sirignano, does not oppose this motion.

WHEREFORE, the United States respectfully requests that the Court grant an extension

of time, to May 1, 2009, to file its response to the defendant's Osgood's Motion to Compel Discovery Related to Pen Register, Cell Phone site, or GPS Data (Doc. 1578) .

Respectfully submitted,

GREGORY J. FOURATT
United States Attorney

/s/ James R.W. Braun

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of April, 2009, I filed the foregoing pleading electronically through the CM/ECF system, which is designed to cause counsel of record for the defendant to be served by electronic means.

/s/ James R.W. Braun

JAMES R.W. BRAUN
Assistant U.S. Attorney